

EXHIBIT E

From: Andrew S. Bruns <abrun@keker.com>
Sent: Thursday, February 18, 2021 1:44 PM
To: Gannon, Kevin; mkamber@keker.com; kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Cc: Singular; Vella, Matthew D.; Hayes, Paul
Subject: RE: Singular v. Google - Notice of Deposition of David Patterson

Kevin,

Your request for the identification of a witness and dates for a Rule 30(b)(6) deposition is premature in light of our unresolved disputes related to the notice you served on October 2, 2020.

As you'll recall, Google responded to that request in a letter dated October 9, 2020, identifying various ways in which the notice is improper, including its burdensome volume (i.e., 102 topics), the overbreadth of many individual topics, and the fact that several topics target information not appropriately sought via Rule 30(b)(6) deposition (e.g., Google's non-infringement contentions and obviously privileged information). Based on these issues, Google's letter requested that Singular withdraw, revise, and re-serve its notice. If Singular was unwilling to do so, Google's October 9 letter asked you to provide convenient times to meet and confer. Singular has yet to respond to that letter.

Met with silence, Google served formal objections consistent with its earlier correspondence on October 31, 2020. Singular has likewise never responded to or otherwise addressed those formal objections.

Your email yesterday was the first communication Singular has provided related to its Rule 30(b)(6) notice since serving the notice itself nearly five months ago, despite Google's repeated efforts summarized above. In light of your email, we now renew our request that Singular withdraw, revise, and re-serve its Rule 30(b)(6) notice to resolve the issues addressed above and in Google's prior communications. If you are unwilling to do so, please propose times next week that are convenient for you to meet and confer over these issues; if unresolved, they may necessitate Google moving for a protective order.

Best,
Andy

Andrew Bruns

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Pronouns: he/him/his

From: Gannon, Kevin <kgannon@princelobel.com>
Sent: Wednesday, February 17, 2021 12:15 PM
To: Matthias Kamber <MKamber@keker.com>; kvp-singular <kvpsingular@keker.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Cc: singular@princelobel.com; mvella@princelobel.com; phayes@princelobel.com
Subject: RE: Singular v. Google - Notice of Deposition of David Patterson

[EXTERNAL]

Matthias,

While we are waiting for dates in February for the deposition of David Patterson, please identify and provide dates for a deposition for a Google witness pursuant to 30(b)(6) to testify with respect to topics 5, 62-65, 70-73 and 91-93 from the attached Rule 30(b)(6) notice that was originally served on October 2, 2020.

Thanks,
Kevin

Kevin Gannon

Prince Lobel Tye LLP
One International Place, Suite 3700
Boston, Massachusetts 02110

617 456 8061 Direct
kgannon@princelobel.com

From: Gannon, Kevin
Sent: Friday, February 12, 2021 3:58 PM
To: Matthias Kamber <mkamber@keker.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; nhueston@kblfirm.com; kvpsingular@keker.com
Cc: Singular <Singular@princelobel.com>; Hayes, Paul <phayes@princelobel.com>; Vella, Matthew D. <mvella@princelobel.com>
Subject: RE: Singular v. Google - Notice of Deposition of David Patterson

Matthias,

Please provide alternative dates in February for this deposition. We will make arrangements to take it by remote means.

Thanks,
Kevin

Kevin Gannon

Prince Lobel Tye LLP
One International Place, Suite 3700
Boston, Massachusetts 02110

617 456 8061 Direct
kgannon@princelobel.com

From: Matthias Kamber [mailto:mkamber@keker.com]
Sent: Thursday, February 11, 2021 3:35 PM
To: Gannon, Kevin <kgannon@princelobel.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; nhueston@kblfirm.com; kvpsingular@keker.com
Cc: Singular <Singular@princelobel.com>; Hayes, Paul <phayes@princelobel.com>; Vella, Matthew D. <mvella@princelobel.com>
Subject: RE: Singular v. Google - Notice of Deposition of David Patterson

Kevin,

We will be providing objections either today and tomorrow and are still waiting to hear back regarding potential availability. Accordingly, the deposition will not proceed on the 17th as noticed.

Best,

Matthias

From: Gannon, Kevin <kgannon@princelobel.com>

Sent: Thursday, February 11, 2021 12:13 PM

To: wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; nhueston@kblfirm.com; kvp-singular@keker.com; Matthias Kamber <MKamber@keker.com>

Cc: singular@princelobel.com; phayes@princelobel.com; mvella@princelobel.com

Subject: RE: Singular v. Google - Notice of Deposition of David Patterson

[EXTERNAL]

Counsel,

Please confirm that the deposition of David Patterson will take place on the date noticed so that we can make the arrangements.

Thanks,
Kevin

Kevin Gannon

Prince Lobel Tye LLP
One International Place, Suite 3700
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617 456 8061 Direct
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From: Gannon, Kevin

Sent: Thursday, February 4, 2021 6:55 PM

To: 'wgs-singularv.google@wolfgreenfield.com' <wgs-singularv.google@wolfgreenfield.com>; 'abhansali@kblfirm.com' <abhansali@kblfirm.com>; 'mkwun@kblfirm.com' <mkwun@kblfirm.com>; 'nhueston@kblfirm.com' <nhueston@kblfirm.com>; 'kvp-singular@keker.com' <kvp-singular@keker.com>; Matthias Kamber <mkamber@keker.com>

Cc: Singular <Singular@princelobel.com>; Hayes, Paul <phayes@princelobel.com>; Vella, Matthew D. <mvella@princelobel.com>

Subject: RE: Singular v. Google - Notice of Deposition of David Patterson

Counsel,

Please see attached.

Thanks,
Kevin

Kevin Gannon

Prince Lobel Tye LLP
One International Place, Suite 3700
Boston, Massachusetts 02110

617 456 8061 Direct

kgannon@princelobel.com

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